

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In Re:)	
)	
THE WHEATLAND GROUP, LLC)	Case No. 10-12856 RGM
)	Chapter 11
Debtor.)	

**APPLICATION TO EMPLOY
ROGANLAWFIRM, PLLC
AS COUNSEL TO DEBTOR**

COMES NOW The Wheatland Group, LLC, the Debtor and Debtor in Possession herein, and hereby files this Application seeking authority to employ RoganLawFirm, PLLC (“RLF”), as counsel to the Debtor, effective April 12, 2010, and states as follows:

1. This proceeding was commenced by the Debtor’s voluntary Chapter 11 petition, filed on April 12, 2010 (the “Petition Date”), in the United States Bankruptcy Court for the Eastern District of Virginia, Alexandria Division.
2. The Debtor has continued to operate its business and conduct its affairs since the Petition Date as a Debtor in Possession. No trustee or creditors committee has been appointed in this case.
3. The Debtor is a Virginia limited liability company, with its principal place of business in Loudoun County, Virginia.

Christopher L. Rogan, Esquire (VSB #30344)
ROGANLAWFIRM, PLLC
30-D Catoctin Circle, SE
Leesburg, Virginia 20176
(703) 771-9191/Telephone
(703) 777-9797/Facsimile
Proposed Counsel to Debtor

4. The Debtor requires experienced bankruptcy counsel to advise and represent it in this Chapter 11 proceeding.
5. The Debtor has selected RLF to represent him in this Chapter 11 proceeding.
6. The Debtor has agreed to pay RLF a retainer in the amount of \$15,000 (the “Retainer”), of which \$10,384.38 was paid pre-petition and is being held in trust. The \$4,617.62 balance of the retainer is to be paid on or before April 14, 2010. The retainer was funded through capital contributions from the Debtor’s principal, Joseph Evangelisto.
7. The Retainer will be held in trust by RLF, pending application to and allowance by this Court of the fees and expenses incurred by counsel.
8. The services of RLF are necessary and will be of benefit to the Debtor and the bankruptcy estate.
9. RLF’s principal, Christopher L. Rogan, Esq. (“Rogan”), was admitted to the Virginia Bar in 1989, and has practiced bankruptcy and commercial/corporate law since that time. Rogan is admitted in Virginia, Maryland and the District of Columbia and has represented various debtors, creditors, trustees and creditors’ committees in a numerous bankruptcy proceedings in all three jurisdictions. His hourly rate is \$345.00 (subject to normal periodic adjustments). In addition, paralegal time for this matter is billed at the rate of \$135.00.
10. It is anticipated that, as Debtor’s counsel, RLF will assist the Debtor in the following: (a) preparing and filing the Debtor’s schedules, statement of financial affairs, and other motions and pleadings required in this case; (b) preparation and filing of cash collateral agreements/motions; (c) advising the Debtor and its representatives as to their

responsibilities under the Bankruptcy Code; (d) evaluating and preparing a plan of reorganization; (e) negotiating with the Debtor's secured and other creditors with respect to the Debtor's reorganization efforts; (f) evaluating the various claims against the Debtor; and (g) reviewing monthly reports and preparing the same for filing.

11. The Debtor seeks approval of RLF's employment effective April 9, 2010.

12. RLF respectfully requests that it be authorized to submit fee applications every sixty (60) days, in this case.

13. RLF shall submit monthly invoices to the Debtor for fees and costs incurred, which the Debtor and RLF request that the Debtor be permitted to pay as and when submitted (after the initial retainer has been exhausted), with the funds so paid to be held in trust, pending application and approval by the Court.

14. This Application, RLF's Verified Statement and Notice were served on the Debtor, the United States Trustee and all secured and unsecured creditors in this case on April 13, 2010.

WHEREFORE, based upon the foregoing, the Debtor respectfully requests entry of an Order authorizing the employment of RoganLawFirm, PLLC, effective April 12, 2010, and for such further relief as this Court deems just and proper.

Dated: April 13, 2010

Respectfully submitted,

The Wheatland Group, LLC

By Counsel

/s/ Christopher L. Rogan
Christopher L. Rogan, Esquire (VSB #30344)
ROGANLAWFIRM, PLLC
30-D Catoctin Circle, SE
Leesburg, Virginia 20175
(703) 771-9191/Telephone
(703) 777-9797/Facsimile
Proposed Counsel to Debtor

CERTIFICATE OF SERVICE

I hereby certify that service of a true copy of the foregoing has been made as follows:

Type of Service:	Electronic Mail via the United States Bankruptcy Court and by First Class Mail
Date of Service:	April 13, 2010
Persons served and address:	All persons listed on the attached service list.
Item Served:	Application to Employ ROGANLAWFIRM, PLLC as Counsel to Debtor

/s/ Christopher L. Rogan
Christopher L. Rogan